

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHAD LINDSEY MOSHELL, Individually  
and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SASOL LIMITED, DAVID EDWARD  
CONSTABLE, BONGANI NQWABABA,  
STEPHEN CORNELL, PAUL VICTOR, and  
STEPHAN SCHOEMAN,

Defendants.

Case No. 1:20-cv-01008-JPC

CLASS ACTION

**LEAD PLAINTIFF'S UNOPPOSED  
MOTION FOR PRELIMINARY  
APPROVAL OF PROPOSED CLASS  
ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff David Cohn (“Lead Plaintiff”) and Additional Representative Plaintiff Chad L. Moshell (collectively, “Plaintiffs”), on behalf of themselves and all other members of the proposed Settlement Class,<sup>1</sup> will move this Court on a date and at such time as may be designated by the Honorable John P. Cronan, United States District Judge of the Southern District of New York, United States Courthouse, Courtroom 12D, 500 Pearl Street, New York, NY 10007, or telephonically or by videoconference, for entry of an Order: (i) granting preliminary approval of the proposed Settlement; (ii) preliminarily certifying, for settlement purposes only, the proposed Settlement Class; (iii) approving the parties’ proposed form and method of giving notice to the proposed Settlement Class; and (iv) setting a date for a Final Approval Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and Litigation Expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and Agreement of Settlement dated April 1, 2022 (the “Stipulation”), and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion.

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<sup>1</sup> All capitalized terms used in this memorandum that are not defined have the same meanings as in the Stipulation and Agreement of Settlement, dated April 1, 2022 (the “Stipulation”). The Stipulation is annexed as Exhibit (“Ex.”) 1 to the Declaration of Steve W. Berman (“Berman Decl.”), filed herewith.

DATED: April 5, 2022

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

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